

April 13, 2009

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W. Suite TW-A325  
Washington, DC 20554

Filed Electronically

Re: The Commission's Consultative Role in the Broadband Provisions of the  
Recovery Act, GN Docket No. 09-40

Dear Ms. Dortch:

The Small Business & Entrepreneurship Council (SBE Council) is pleased to file the following comments regarding the Commission's request for such on the Commission's consultative role under the terms of the American Recovery and Reinvestment Act of 2009.

SBE Council is a 70,000-member national, nonprofit small business advocacy organization dedicated to protecting small business and promoting entrepreneurship. Our members, and small business owners throughout the country, have a vested interest in effective implementation of the Act's broadband stimulus program. Expanding the benefits of broadband is a critical issue for expanding and sustaining U.S. entrepreneurship. And, as SBE Council has communicated to the National Telecommunications and Information Administration (NTIA) and the Rural Utilities Service (RUS), implementation of the stimulus funding must be conducted in an efficient, timely, transparent and nondiscriminatory way.

Broadband and Small Business: Stimulus Can Enable Growth and Expand Entrepreneurial Opportunities

Extending the reach of broadband services to America's small business owners and entrepreneurs is a critical national issue.

Indeed, with expanded access to advanced telecommunications technologies and services in general, small business owners will have greater access to tools that will help them become more competitive and successful in today's challenging economic climate.

The 2009 American Recovery and Reinvestment Act includes more than \$7 billion for broadband deployment. The funds provided by the Act represent an extraordinary opportunity to extend and expand broadband service to underserved and unserved Americans – many of which are small business owners, or individuals wishing to pursue economic opportunity through entrepreneurship.

Properly targeting unserved areas, while relying on state and local expertise to manage an efficient and well-focused plan of execution -- where transparency and accountability are required -- will help ensure that tax dollars are used with utmost care, and that the public receives the best “return-on-investment” for these precious resources.

### Broadband a Vital Tool for Entrepreneurs

Expanded access to broadband has become increasingly vital for small business owners and entrepreneurs. Access to broadband not only gives business owners access to new markets and consumers, it offers the opportunity to utilize innovative and essential tools that help lower costs, and increase efficiencies. Such productivity and money-saving tools help lower the barriers to entrepreneurship in general, which means more individuals can pursue the path of business ownership. Indeed, broadband has enabled individuals to run businesses regardless of location. Removing, or greatly reducing, geographic limitations to where individuals can start and grow businesses will help spur economic growth and job creation in areas of the country where it is most desperately needed.

The benefits of access to advanced telecommunications technologies and services for small business owners are clear. Broadband has delivered a vast array of products and services that help small businesses more efficiently deliver and receive information; communicate with employees, customers, partners and suppliers; utilize products such as e-commerce; and market their product and services. Entrepreneurs are adopting (or were the first to adopt) solutions such as communications applications (for example, VOIP and virtual meeting tools), as well as other products that allow them to conduct business more strategically and efficiently. Extending broadband service, and the type of services and tools that benefit small business owners, to unserved communities will create a level playing field, and give many more individuals greater hope and opportunity for pursuing the American dream.

The stimulus package will also enable demand for broadband technology, which means small business owners – as both consumers and entrepreneurs serving the market – will benefit from improved healthcare delivery and options (for example, IT-based medical records and health care delivery), education and technical training programs and energy efficiency.

### What Needs to Be Done?

First, we need to make sure that unserved individuals – that is, populations in areas of the country that cannot obtain broadband service from any provider – are the beneficiaries of the stimulus funding. Stimulus funds must focus on providing broadband to areas where it truly does not exist. Not only is this a rational objective, the outcome is easy to measure – that is, does a community or region now have access to broadband where it did not in the past?

Mapping the current availability of broadband is essential, as well as the development and implementation of an open and transparent process for the public to understand where stimulus funds are going and why. Ideally, this process should will not overly lengthy or mired down in red tape to ensure that funds are being deployed and invested in a rapid manner.

Content of the mapping should provide information that is clear to all constituencies, but primarily should be dedicated to understanding the extent to which an area is unserved. Coverage maps should be available online, and include projects that have been funded (and by what agency). With respect to the funding of grants to states or regional public-private partnerships, proposals must include key details like time frames, expenditures, and progress reports (posted online) to enhance transparency and accountability.

Finally, but just as critically, this important program should not get sidetracked or undermined by unnecessary red tape or regulatory restrictions. Timely implementation and full participation by participants is central to delivering broadband quickly, and sustaining investment over the long term. The currently “light” federal regulatory framework has enabled continued investment in broadband and broadband technologies, and this same approach needs to occur in executing stimulus funding projects. Placing “strings” or eligibility requirements on providers would only hurt those that the program is designed to help.

In general, SBE Council recommends a targeted, streamlined and transparent approach for the effective implementation of the American Recovery and Reinvestment Act’s broadband stimulus program. Small business owners and individuals who are currently not served by broadband will reap great rewards by expanding access, but only if it is done in a timely, open and unhindered fashion.

Thank you for the opportunity to comment on this important proceeding.

Sincerely,

Karen Kerrigan, President & CEO

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